

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
SK Hand Tool Site - Removal Polrep  
Final Removal Polrep

US EPA RECORDS CENTER REGION 5



435618



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #3  
final  
SK Hand Tool Site  
C574  
Defiance, OH  
Latitude: 41.2804630 Longitude: -84.3394590

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**From:** Partap Lall, OSC  
**Date:** 7/9/2012  
**Reporting Period:** June 11 ,2012 to June 28, 2012

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C574	<b>Contract Number:</b>	EP-S5-08-02
<b>D.O. Number:</b>	0107	<b>Action Memo Date:</b>	3/2/2012
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	5/29/2012	<b>Start Date:</b>	5/17/2012
<b>Demob Date:</b>	6/28/2012	<b>Completion Date:</b>	6/28/2012
<b>CERCLIS ID:</b>	OHN000510633	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time Critical Removal Action

#### 1.1.2 Site Description

S&K Hand Tool Corp., was a manufacturer of hand tools in Defiance, Ohio. One of the manufacturing activities was electroplating. They closed shop sometime in July, 2010. Several containers of waste remained at the site which included electroplating related hazardous waste.

##### 1.1.2.1 Location

**The site is located at**

135 Hickory Street  
Defiance, OH 43512

Latitude: 41.2804630  
Longitude: -84.3394590

##### 1.1.2.2 Description of Threat

The facility is not secured and it has been vandalised. The local county commissioners had expressed concern about the potential release of waste off site. Site assessment indicated corrosive, reactive and oxidizer waste materials located in a populated area in Defiance

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On November 30, 2011, EPA conducted a site assessment. During the assessment, EPA collected samples. Samples showed drums SK-DRUM-001 and SK-DRUM-002 contained liquids with a pH of 2 standard units according to regulations at 40 CFR 261.22, makes the waste hazardous for characteristics of corrosive. SK-DRUM-004 was found to contain cyanide, which according to regulations at 40 CFR 261.23, makes

hazardous for characteristics of reactivity. EPA also documented labeled hazardous waste marked with F006 and D007, which indicated the drums contain wastewater treatment sludges from electroplating 261.31 (F006) and exceed the maximum concentration of contaminants for the toxicity characteristic per 40 CFR 261.24 (F007).

The wastes are unsecured, exposed to the elements, and can be accessed by anyone entering the site. Manholes are open. The OEPA has requested EPA's assistance in addressing environmental hazards at the site.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

#### **2.1.2 Response Actions to Date**

6/11/2012 to 6/15/2012

The waste streams were finalized and samples were sent to ALS laboratory in Holland, MI. Small containers were consolidated in their respective waste streams, and the newly generated empty containers were crushed/cut up in a roll-off box.

Acid waste stream containers were segregated on pallets and stretch wrapped for shipping.

The cleaning of the former heat and treat room (oil room) was completed and given a final broom sweeping.

The cleaning of the plating area began with the removal and disposal of the large piping and duct work debris.

One full 30 cubic yard roll off box was picked up from the site and sent to Republic Landfill in Fort Wayne, IN. An empty roll-off box was dropped off in its place.

6/18 to 6/22, 2012

The removal of large debris was completed in the polishing room. Debris was disposed of in roll-off boxes.

Oil based paint, latex paint and grease waste streams were over-packed into one cubic yard lined HazBox containers in preparation for shipping. Plating area was cleared of all debris and broom swept.

Two roll-off boxes filled with RCRA empties and debris solids were shipped to Republic Landfill on both 6/18 and 6/19.

The cleaning in the polishing room was completed with a final broom sweeping.

The poly tank located outside of the facility that contained rainwater was drained of its contents and rendered unusable.

The crushing/cutting and disposal of RCRA empty containers was ongoing throughout the week. Wastes were packaged and prepared for disposal.

6/25 to 6/28, 2012

All waste was shipped off-site to disposal facilities as shown in the progress metrics table below.

A final walk through was conducted with the local, county and township officials before handing over the contr  
All equipment and personnel were de -mobilized on 6/28/2012.

### .1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Company is bankrupt, no viable PRP has been identified.

### 2.1.4 Progress Metrics

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>
Sodium Hydroxide	Solid	55 gal	009654980 JJK	X	
Sodium Bisulphite	liquid	55 gal	009654981 JJK	X	
Base liquids cossosive	liquid	70 gal	009654982 JJK	X	
Sulphuric Acid	liquid	165 gal	009654980 JJK	X	
Hydrochloric Acid	liquid	180 gal	009654980 JJK	X	
Neutral Liquids (D007)	liquid	2106 gal	009654979 JJK	X	
Grease	semi-solids	2 cu yds	009654981 JJK		x
Latex Paint cans,off spec	liquid	1 cu yd	009654981 JJK		x
oil base paint, off-spec	liquid	1 cu yd	009654979 JJK		x
oil-water mix	liquid	2004 gal	010011811 JJK	X	
Tolylidene diisocyanate	liquid	40 lbs	010008982 JJK	X	
RCRA empty containers ,non-haz	Solids	120 cu yd			x
<b>R5 Priorities Summary</b>					
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored				
	Cubic yards of contaminated sediments removed and/or capped				
	Gallons of oil/water recovered				

	Acres of soil/sediment cleaned up in floodplains and riverbanks	
Stand Alone Assessment	Acres Protected	2
	Number of contaminated residential yards cleaned up	
	Human Health Exposures Avoided	100
	Number of workers on site	8
Contaminant(s) of Concern		
Contaminant(s) of Concern Acids, Bases, TDI, Metallic waste		

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

None, the removal action is complete

#### 2.2.1.1 Planned Response Activities

None.

#### 2.2.1.2 Next Steps

None

#### 2.2.2 Issues

None

## 2.3 Logistics Section

No information available at this time.

## 2.4 Finance Section

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$200,000.00	\$143,900.00	\$56,100.00	28.05%
TAT/START	\$37,000.00	\$32,000.00	\$5,000.00	13.51%
<b>Intramural Costs</b>				

<b>Total Site Costs</b>	\$237,000.00	\$175,900.00	\$61,100.00	25.78%
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\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was prepared. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial information the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not represent an exact monetary figure which the government may include in any claim for cost recovery.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

### **3.1 Unified Command**

### **3.2 Cooperating Agencies**

OEPA

Defiance County EMA

Sheriff's office

Defiance Water and Sewerage Department

South Richland Fire Department

## **4. Personnel On Site**

EPA OSC

2 OTIE START members

5 EQM ERRS personnel

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.